

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: Case No.: 18-17819  
**Gurnam S. Mavi** : Chapter 13  
**Amrik K. Mavi** : Judge Eric L. Frank  
**Debtor(s)** : \* \* \* \* \*

**OBJECTION OF PNC BANK, NATIONAL ASSOCIATION TO CONFIRMATION OF  
THE AMENDED PLAN (DOCKET NUMBER 26)**

PNC Bank, National Association ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Second Amended Chapter 13 Plan ("Plan") filed by Gurnam S. Mavi and Amrik K. Mavi (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 1948 Cabernet Pl., Easton, PA 18045-5403 ("Property").
2. Creditor has filed Proof of Claim number 11 in the amount of \$33,986.53 as a total debt claim.
3. Debtor's Plan treats Creditor's secured claim as long term debt that will survive discharge. However, the subject loan will mature on November 15, 2023.
4. Pursuant to 11 U.S.C. §1322(c)(2), Debtor's Plan should therefore provide for payment in full of Creditor's claim. Failure to do so will result in immediate default upon completion of the Plan.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Karina Velter  
Karina Velter, Esquire (94781)

Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
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Attorneys for Creditor  
The case attorney for this file is Karina  
Velter.  
Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)

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                  : \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

**Debtor(s)**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of PNC Bank, National Association to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,  
Philadelphia, PA 19107

Scott Waterman, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave., Reading,  
PA 19606

Scott M. Wilhelm, Attorney for Gurnam S. Mavi and Amrik K. Mavi, P.O. Box 800, 305  
Roseberry Street, Phillipsburg, NJ 08865, maddid@wwgrlaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on July 24, 2019:

Gurnam S. Mavi and Amrik K. Mavi, 1948 Cabernet Place, Easton, PA 18045

Gurnam S. Mavi and Amrik K. Mavi, 1948 Cabernet Pl, Easton, PA 18045-5403

Bank of America, P.O. Box 31785, Tampa, FL 33631

DATE: July 24, 2019

/s/ Karina Velter

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